

UNITES STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

SHAWN HELD

Plaintiff

V.

BRENTON DAVIS, individually and as
COUNTY EXECUTIVE OF THE
COUNTY OF ERIE and ERIE COUNTY,
PENNSYLVANIA

Defendants

Case No.: 1:23-cv-00319 SPB

SECOND MOTION TO EXTEND DISCOVERY DEADLINE

NOW COMES the Plaintiff, Shawn Held, by counsel and respectfully move this Honorable Court for an Order Extending Discovery Deadline, respectfully representing:

1. On January 5, 2024, this Honorable Court entered an Initial Scheduling Order setting the date for fact discovery completion for May 4, 2024.
2. On May 1, 2024, Defendants filed a Motion to Extend Discovery Deadline.
3. On the same date, this Honorable Court entered an Order granting the Motion to Extend Discovery Deadline and the completion date for July 3, 2024.
4. A post-discovery status conference is currently set for July 18, 2024.
5. Plaintiff is requesting an additional sixty (60) days to complete discovery.

This spring, counsel for Plaintiff and counsel for Defendant were engaged in preparation for a civil trial. That preparation consumed a significant amount of time and kept them from advancing discovery in this matter.

6. Plaintiff requires two more depositions of County witnesses and it is believed that Defendants will want to take one more witness deposition. This discovery can be completed in less than 60 days.

7. Counsel for Plaintiff has inquired to counsel for Defendants as to their position on this Motion and has been informed that Defendants do not consent to the relief requested.

8. Plaintiff does not anticipate the need for an additional extension of time to complete fact discovery.

WHEREFORE, Plaintiff respectfully moves this Honorable Court to grant the requested extension to complete discovery.

McNair Law Offices, PLLC

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